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Via ECF

Honorable Margo K. Brodie
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States v. Reyes, 21-cv-05578 (MKB)

Dear Chief Judge Brodie:

I represent the Reyes defendants.

On January 25th, the court directed that the Reyeses respond by today to the government's motion to reopen the case so that a judgment may be entered for post-judgment interest and pre-judgment interest from February 21, 2023. The Reyeses do not object in principle to the assessment of interest on the award. However, the interest calculations in the proposed judgment are opaque, and we request the government be directed to show its math, so to speak. Once we are informed of the interest rates used in the calculations, and how the government arrived at its numbers, we could then advise the court whether the Reyeses agree or disagree with the calculations.

Accordingly, we request that the judgment be held in abeyance until the requested information is provided.

Respectfully submitted,

MAZZOLA LINDSTROM LLP


Richard E. Lerner

Service via ECF